



**Michael J. Willemin**  
[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)

March 31, 2025

**VIA ECF**

The Honorable Jessica G. L. Clarke  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: [Parker v. Bursor et al., Civil Case No.: 1:24-cv-00245-JGLC-RFT](#)

Dear Judge Clarke,

We represent Plaintiff in this action and write in response to Defendants' request that the Court temporarily seal its own Opinion and Order at Dkt. No. 345. Dkt. No. 348.

Put simply, enough is enough. This case has been largely under seal for the better part of a year. The reason for that is because Defendants made false representations in the first instance that Plaintiff was going to identify minors in her Complaint. That was never going to happen, and did not ever happen. As such, Defendants' objection to the initial Report and Recommendation, as well as their sealing motion, were at all times frivolous. Their request that Your Honor seal the Court's Opinion and Order is likewise frivolous. Obviously, if there was any basis to seal that Order, your Honor would have filed it under seal. However, there is no basis, as it is nothing more than an ordinary order on motions that Defendants should never have made in response to a Complaint that should have been publicly filed a year ago.

The bottom line is that these proceedings are set in a United States District Court, where open and public access to judicial documents is not simply preferred, but required. There is nothing in Your Honor's Order that warrants sealing, and Defendants' request should be denied.

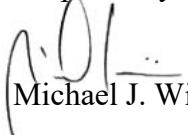
We will respond to any forthcoming motion to stay the deadline to file the Complaint, as well as to the purported appeal, under separate cover.

**WIGDOR.**

Hon. Jessica G. L. Clarke  
March 31, 2025  
Page 2

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

  
Michael J. Willemin

Cc: All counsel of record *via* ECF